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D.B. INCOME TAX APPEAL NO.42/2007.

C.I.T. Vs. Amar Chand

Date of Order :: 12th April 2007

HON'BLE MR. JUSTICE P.B.MAJMUDAR
HON'BLE MR. JUSTICE DINESH MAHESHWARI

Mr. K.K. Bissa, for the appellant.

...

Heard the counsel.

In our opinion, the Tribunal has not committed any error of law. The Tribunal has rightly found that the second set of proceedings was based on the letter of DCIT, Jaipur which was again based on the original letter of ITO (CIB), Jaipur, for which the Assessing Officer had already completed the assesment. Therefore, the Tribunal has rightly held that the second set of proceedings is merely change of opinion by the Assessing Officer vis-a-vis the first assessment concluded on 30.01.2001 in which all such creditors have been accepted as genuine and addition only for a sum of Rs. 1,02,743/-was made. We fully agree with the reasoning arrived at by the Tribunal. Hence, the appeal is dimissed summarily.

(DINESH MAHESHWARI), J. **(P.B.MAJMUDAR), J.**

Mohan/